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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
v.) No. 08 CR 07
DEAN ROUPAS,) Judge Samuel Der-Yeghiayan
MICHAEL KROL,)
CHUCK MAALI, and)
LEO LANGLEY)

PROTECTIVE ORDER

Upon the oral motion of counsel for the government, it is hereby ORDERED as follows:

1. All materials produced by the United States in preparation for or in connection with any stage of the proceedings in this case, including but not limited to grand jury transcripts, tax records, investigative reports, witness statements, memoranda of interview, tape recordings, computer disks, transcripts, documents, affidavits, and any other tangible items provided by the government (collectively, "these materials") remain the property of the United States. Upon conclusion of the trial of this case and any direct appeals of this case or upon the earlier resolution of the charges against any defendant, all of these materials and all copies made thereof shall be returned to the United States, unless otherwise agreed to by the United States, or unless otherwise ordered by the Court.

2. All these materials produced by the United States may be utilized by each defendant, each defendant's counsel of record, and employees and agents of defendant's counsel solely in connection with the defense of this case and for no other purpose and in

connection with no other proceeding. Defendants' counsel of record and defendants shall not disclose these materials either directly or indirectly to any person other than the defendant, defendant's counsel of record, counsel for a co-defendant, defendant's spouse, defendant's family members, persons employed or agents working with defendant's counsel to assist in the defense, potential witnesses - and their attorneys and agents - to whom documents relevant to their testimony may be shown in connection with the defense of this case, or such other persons to whom the United States agrees, or the Court explicitly authorizes disclosure (hereinafter collectively referred to as "authorized individuals"). Any notes or records of any kind that defense counsels or defendants may make relating to the contents of materials provided by the United States shall not be disclosed to anyone other than the authorized individuals, and all such notes and records shall not be disclosed except as provided by this Order.

3. When these materials produced are disclosed by a defendant or a defendant's counsel of record to authorized individuals pursuant to the terms of this Order, the authorized individuals shall not disclose these materials, or notes pertaining to these materials, either directly or indirectly to any person.

4. These materials shall not be copied or reproduced by defense counsel or defendant except for their own use, which includes allowing authorized individuals to review these materials, and such copies and reproductions shall be treated in the same manner as the original matter.

5. Defendant's counsel of record shall inform all authorized individuals to whom any of these materials are disclosed that the disclosure is made pursuant to the terms of this Order; shall provide each of these individuals with a copy of this Order; and shall direct each of these individuals to comply with the terms of this Order.

6. The restrictions set forth in this Order do not apply to documents that are in the public record or public domain.

7. The restrictions set forth in this Order do not apply to the United States, and nothing in this Order limits the government's use and/or dissemination of these materials.

8. This Order may be modified by the agreement of the parties with permission of the Court, or by further Order of the Court.

9. Any violation of this Order may result in imposition of civil and criminal sanctions.

ENTER:



SAMUEL DER-YEGHIAYAN
United States District Judge

Dated: January 17, 2008